

**MAYER, BROWN & PLATT**

190 SOUTH LA SALLE STREET

CHICAGO, ILLINOIS 60603-3441

EPA Region 5 Records Ctr.



225365

**MICHAEL P. RISSMAN**  
DIRECT DIAL (312) 701-7834  
DIRECT FAX (312) 706-9112  
mrisman@mayerbrown.com

MAIN TELEPHONE  
312-782-0800  
MAIN FAX  
312-701-7711

March 22, 2000

VIA FACSIMILE AND FIRST CLASS MAIL

Ms. Debra Regel  
U.S. EPA- Region 5, Enf. Spec.  
Emergency Enforcement  
& Support Section SE-5J  
77 W. Jackson Blvd.  
Chicago, IL 60604-3590

Re: Lindsay Light II Site (RV3 North Columbus Drive)

Dear Ms. Regel:

I am writing on behalf of Grand Pier Center LLC ("Grand Pier") in response to your notice letter dated March 17, 2000 to Grand Pier regarding the area designated by USEPA as North Columbus Drive RV3.

As I discussed with Ms. Mary Fulghum by phone on March 20, Grand Pier is prepared to participate with other private parties in the "removal action" directed by USEPA for the site under the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"). Grand Pier anticipates that the required work will be performed by Kerr-McGee Chemical LLC, Grand Pier, and their contractors, via the implementation of the Work Plan currently under discussion with USEPA, once such Work Plan is approved.

Grand Pier is responding to USEPA's notice letter, and participating in the removal action, without any admission of liability, either to USEPA or to any other party, either under CERCLA or any other law. Grand Pier is reserving its claims for damages and its right to seek recovery or contribution of its response costs from other private parties or pursuant to Section 106 of CERCLA. Grand Pier does not concede that it is a responsible party, and any reference by Grand Pier to itself as a "potentially responsible party" should not be interpreted as an admission of liability.

We look forward to working with you to finalize the Work Plan and implement this emergency removal action as promptly as possible.

**MAYER, BROWN & PLATT**

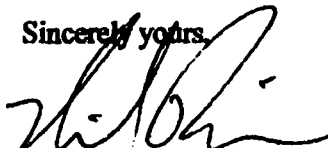
Ms. Debra Regel

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If you wish to discuss this further, please feel free to contact me.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Michael P. Rissman". The signature is fluid and cursive, with a large initial "M" and "P".

Michael P. Rissman

cc: M. Fulghum, USEPA, via first class mail  
J. Smith, Covington & Burling, via facsimile